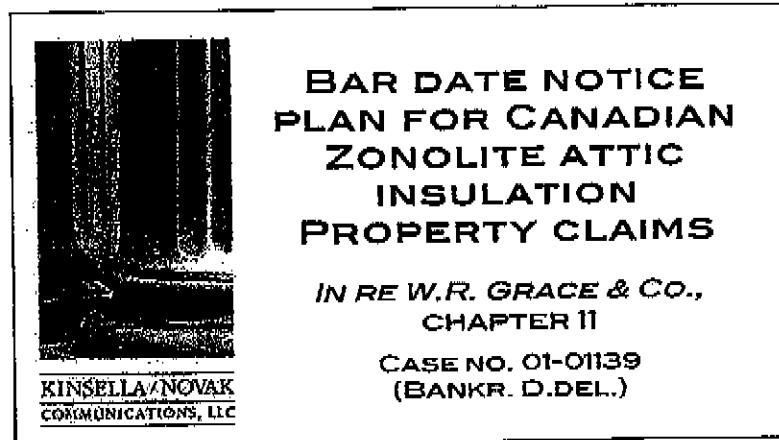


**Clean Exhibit D to Proposed Form of Order --Publication Notice  
Program**



2120 L STREET, NW | SUITE 205 | WASHINGTON, DC 20037  
PHONE: 202.686.4111 | FAX: 202.293.6961 | EMAIL: [INFO@KINSELLA-NOVAK.COM](mailto:INFO@KINSELLA-NOVAK.COM) | [HTTP://WWW.KINSELLA-NOVAK.COM](http://WWW.KINSELLA-NOVAK.COM)

THE ART & SCIENCE OF LEGAL NOTIFICATION

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**Exhibit 1 - ZAI PD Published Bar Date Notice**

**Exhibit 2 - TV Spot Layout**

**Exhibit 3 - Proposed Budget**

## FIRM OVERVIEW

Kinsella/Novak Communications, LLC ("KNC") is a nationally-recognized advertising and legal notification consulting firm specializing in the design and implementation of class action and bankruptcy notification programs to reach unidentified class members and claimants.

KNC has developed and directed some of the largest and most complex national notification programs in the country, primarily in antitrust, bankruptcy, consumer fraud, mass tort and product liability litigation. Specific cases have involved, among others, asbestos, breast implants, home siding and roofing products, infant formula, pharmaceuticals, polybutylene plumbing, tobacco and Holocaust claims. The firm has developed or consulted on over 250 notification programs and has placed over \$160 million in media notice.

KNC develops advertisements, press materials, Websites and other notice materials that bridge the gap between litigation complexities and the need for a clear and simple explanation of legal rights. The firm designs and produces notices in "plain language." KNC employs industry-recognized tools of media measurement to quantify the adequacy of the notice for the court.

In re W. R. Grace & Co., Chapter 11

## CASE EXPERIENCE

KNC has significant notification experience including designing and implementing notice programs in numerous asbestos-related bankruptcy cases.

### SELECTED CASES

- *In re USG Corporation, Chapter 11,*  
Nos. 01-2094 (RJN) through 01-2104 (RJN) (Bankr. D. Del)
- *In re Swan Transportation Company, Chapter 11,*  
No. 01-11690 (Bankr. D. Del.)
- *In re Owens Corning, Chapter 11,*  
No. 00-03837 (MFW) (Bankr. D. Del.)
- *In re Armstrong World Industries, Inc., Chapter 11,*  
No. 00-4471 (JJF) (Bankr. D. Del.)
- *In re The Babcock & Wilcox Company,*  
No. 00-10992 Section "B" (Bankr. E.D. LA.)
- *In re Raytech Corp.,*  
No. 5-89-00293 (Bankr. D. Conn.)
- *In re The Celotex Corporation, Chapter 11,*  
Nos. 90-10016-8B1 and 90-10017-8B1 (Bankr. M.D. Fla.)

In re W.R. Grace & Co., Chapter 11

## TECHNICAL APPROACH

KNC's technical approach is based on its expertise as a leading provider of notice in class actions, knowledge of court-approved notice programs at the state and federal levels and years of experience in designing and implementing legal notification programs both nationally and internationally.

KNC begins by conducting detailed research on the claims that are the subject of the class action and how they relate to the affected population. This analysis yields the demographic characteristics of claimants – such as age, gender, income, and education level – and the geographic distribution of claimants. This research provides the parameters for identifying and locating claimants and shapes the scope of the notice program.

Specifically, KNC:

- Reviews demographic and product information provided by the client, performs independent research and establishes a demographic profile of the target audience. All media selections are based on this profile to ensure the optimum reach of potential claimants and frequency of message exposure.
- Examines the geographic distribution of potential claimants to determine effective geographic coverage.
- Evaluates and compares the relative effectiveness of media vehicles – consumer magazines, newspapers, specialty publications, broadcast television, radio and the Internet – in reaching the target audience.
- Analyzes publications using syndicated data sources and tools, such as the Audit Bureau of Circulation statements, which certify how many readers buy or obtain copies of publications, and MediaMark Research, Inc., which measures how many people open or read publications.
- Analyzes syndicated data from comScore and/or Nielsen/NetRatings for demographic composition of Internet Website visitors. Relies on Internet Advertising Bureau ("IAB") guidelines to account for gross impressions and unique users.
- Relies upon syndicated data from A.C. Nielsen for estimating television viewership. Other syndicated data and tools are used when appropriate.
- Selects media available during the established notice period ensuring timely notice to claimants.
- Creates and implements all appropriate notice communications, including published notice, press releases, television spots, Internet advertising and Websites.

In re W.R. Grace & Co., Chapter 11

- Ensures that published notices and long form notices are written in "plain language."
- Uses established advertising relationships to negotiate with advertisers to secure optimum placement with respect to the media habits of the target audience.
- Designs and maintains a Website to enable claimants to access all relevant information including long form notices, claim forms and court documents. Provides registration and email capabilities on the site.
- Integrates all aspects of the notification program with designated claims administrators.
- Provides advice, affidavits, depositions and court testimony with respect to the design and implementation of the notification program.

In re W. R. Grace & Co., Chapter 11

## RELEVANT MANUFACTURING HISTORY

W. R. Grace ("Grace") entered into the vermiculite business through its 1963 acquisition of the assets of the Zonolite Company. The Zonolite Company's assets included the world's largest vermiculite mine and mill in Libby, Montana, another mine and mill in South Carolina and various manufacturing plants. Vermiculite is a mica-like mineral that expands after heating. Vermiculite ore from the Libby Mine may contain naturally occurring asbestos.

ZAI is a loose-fill vermiculite used as insulation in attics and was one of the commercial products made from Grace's processed vermiculite. This product was sold from the 1920s or 1930s to 1984 and may have been marketed by other companies under private labels.<sup>1</sup>

---

<sup>1</sup> Loose-fill vermiculite attic insulation produced by Grace was also provided to companies primarily in the New England area, believed to be Wickes Inc., Lumbermen's Mercantile Buyers Corporation, and Carter, which may have marketed the insulation under their private labels.

In re W. R. Grace & Co., Chapter 11

## SITUATION ANALYSIS

This Bar Date notice plan ("Notice Plan") is submitted in connection with *In re W. R. Grace & Co., et al.*, Chapter 11, Case No. 01-01139 in the United States Bankruptcy Court, District of Delaware. This Notice Plan targets holders and potential holders of Property-related Zonolite Attic Insulation Claims ("Canadian ZAI Claimants") in Canada. ZAI claims include, among others, the cost of removal, the diminution of property value or economic loss, or other claims caused by ZAI manufactured by Grace.

The purpose of the Notice Plan is to outline procedures to provide fair and adequate notice to Canadian ZAI Claimants of the Bar Date. The plan is consistent with notice programs KNC designed and implemented in other asbestos bankruptcies and class actions, as well as consumer class actions, all of which have met court approval. To develop the Notice Plan, KNC relied on information provided by Grace and its experts, on research previously conducted in other asbestos litigation and on its experience in designing and executing similar plans.

*In re W. R. Grace & Co., Chapter 11*

## PROPOSED NOTICE PLAN OVERVIEW

The following four-part Notice Plan is recommended:

- Direct notice by mail to all known Canadian ZAI Claimants and their counsel;
- Broad national notice in Canada through the use of paid media - television, magazines, newspapers and Internet banner ads;
- Targeted notice to the Canadian Aboriginal population through the use of magazines, newspapers and television; and
- Earned media through a press release sent to major national print and electronic outlets.

The proposed Notice Plan carefully considers information provided by Grace and research conducted by KNC, including:

- The demographics of Homeowners, which would include Canadian ZAI Claimants - age, gender and other characteristics; and
- The media vehicles through which Homeowners normally receive information.

In re W. R. Grace & Co., Chapter 11

## **DIRECT MAIL NOTICE**

The "Canadian ZAI Claims Property Damage ("PD") Bar Date Notice Package," consisting of the Canadian ZAI PD Claims Bar Date Notice, the Canadian ZAI PD Proof of Claim Form and the General Instructions for completing the Canadian ZAI PD Proof of Claim Form, will be mailed to:

- Known Canadian ZAI Claimants;
- Counsel of record for all readily identifiable Canadian ZAI Claimants with pending Canadian ("CDN") ZAI PD claims;
- Potential Canadian ZAI Claimants on lists maintained by Counsel participating in the proceedings; and
- All individuals who call the toll-free telephone number or write and request a copy of the Canadian ZAI PD Claims Bar Date Notice Package from the Official Claims Agent.

The Canadian ZAI PD Claims Bar Date Notice Package will also be available directly from the Grace Chapter 11 website.

In re W.R. Grace & Co., Chapter 11

## PAID MEDIA METHODOLOGY

KNC notice programs directed to claimants: (1) identify the demographics of claimants and establish a target audience; (2) outline the methodology for selecting the media and other program elements and how they relate to product usage or exposure; and (3) provide results that quantify for the court the adequacy of the notice based upon recognized tools of media measurement.

In the wake of the Supreme Court's decisions in *Daubert v. Merrell Dow Pharmaceuticals*, 509 U.S. 579 (1993) and *Kumho Tire Company v. Carmichael*, 526 U.S. 137 (1999), the reliability of a notice expert's testimony should be tested against the standards developed within the media industry for determining to what degree and at what frequency a target audience has been reached. In assessing the expert's reliability, the court must determine whether the testifying expert "employs in the courtroom the same level of intellectual rigor that characterizes the practice of an expert in the relevant field." (526 U.S. at 152). That showing would likely require evidence that the expert's data and methodology are similar to that used by professionals in the relevant field.

In keeping with the *Daubert* and *Kumho* rulings, KNC employs the methodology and measurement tools used in the media planning and advertising industry for designing and measuring the adequacy of a paid media program to reach a particular audience.

Choosing a target audience encompassing the characteristics of ZAI Claimants is the first step in designing the paid media program. Media vehicles are chosen based on their ability to provide effective and cost-efficient penetration of the target audience. The selected media vehicles are then measured against the target audience to quantify the *reach* of the media program and the *frequency* of exposure to the media vehicles. *Reach* and *frequency* estimates are two of the primary measurements used to quantify the media penetration of a target audience.

- *Reach* is the estimated percentage of a target audience that is exposed one or more times through a specific media vehicle or combination of media vehicles within a given period.
- *Frequency* is the estimated average number of times an audience is exposed to a vehicle carrying the message within a given period of time.

The measured delivery of media to the target audience will be representative of delivery to Canadian ZAI Claimants.

*In re W. R. Grace & Co., Chapter 11*

## TARGET AUDIENCE

KNC used information provided by Grace relating to their asbestos business and asbestos claims history to develop the Notice Plan. This information was provided in the form of:

- An extensive briefing by counsel to the Debtors and by Grace counsel and staff regarding the asbestos history of Grace; and
- Information on Grace's vermiculite and asbestos-containing products including Zonolite Attic Insulation.

To develop a profile of the demographics and media habits of Homeowners, including potential Canadian ZAI Claimants, KNC analyzed syndicated data available from the *2007 2 Year Study* from the Print Measurement Bureau ("PMB") in Canada.

PMB is Canada's leading data provider of audience size, composition and other relevant factors pertaining to major media vehicles. The service provides data on audience size, composition and other relevant factors pertaining to major media vehicles. PMB presents a single-source measurement of major media, products, services and in-depth consumer demographic and lifestyle characteristics.

In selecting the target audiences for purposes of purchasing media, KNC examined the demographics of Homeowners using PMB data. Print media can be measured against the precise audience of Homeowners. However, electronic media cannot be measured against Homeowners but rather can be measured against audiences based on age and/or gender. Because 75.6% of Canadian Homeowners are adults 35 years of age and older, the following broader target audience was selected:

- Adults 35 years of age and older ("Adults 35+")

*In re W. R. Grace & Co. Chapter 11*

## DEMOGRAPHICS

Since all media is purchased based on demographics, it is critical to determine the age, gender and other demographic characteristics of the target audience in order to design a media-based notice program to adequately reach Canadian ZAI Claimants.

ZAI was marketed from the 1920s or 1930s to 1984. While original installations of the product were primarily undertaken by DIY homeowners, there are likely to be many individuals who did not install ZAI themselves but who own homes with the insulation.

Using PMB data, KNC examined the demographics of Canadian Homeowners, which encompasses Canadian ZAI Claimants as indicated in the table below:

DEMOGRAPHICS		HOLDERS
<b>Gender</b>		
Male		49.9%
Female		50.1%
<b>Age:</b>		
35+		75.6%
<b>Education</b>		
Did Not Graduate High School		16.7%
Graduated High School		27.7%
Graduated/Attended College		55.6%
<b>Household Income</b>		
Under \$19,999		6.2%
\$20,000 - \$39,999		15.1%
\$40,000 - \$74,999		33.4%
\$75,000+		45.2%
<b>Race/Ethnicity</b>		
White		87.2%
Black		1.4%
Asian		9.2%
Hispanic		0.8%
Other		1.7%

In re W. R. Grace & Co., Chapter 11

## PAID ADVERTISING

The core of the Notice Plan is paid media placements in national consumer magazines, supplemented by television and Internet activity.

An analysis of the media habits of Adults 35+ indicates that they are above average newspaper readers and average consumers of all other media. Print publications and television programming targeted to Adults 35+ will reach a high percentage of Canadian ZAI Claimants nationally. Internet activity will provide an opportunity to reach Canadian ZAI Claimants who may be lighter print and television consumers.

For the purpose of evaluating the strength and efficiency of the media, television, print publications and Internet were measured against Adults 35+ to establish the *reach* of the media program and the *frequency* of exposure to the media vehicles.

### PRINT ADVERTISING DESIGN AND PLACEMENT

The published form of notice ("Canadian ZAI PD Published Bar Date Notice") is designed as an advertisement to capture and hold the attention of Canadian ZAI Claimants. The ZAI PD Published Bar Date Notice is attached hereto as Exhibit 1.

The black and white advertisement's headline clearly targets and addresses the Canadian ZAI Claimants. The text uses subheads, product description and simple language to inform clearly rather than confuse. To facilitate identification of vermiculite, pictures are included. The website address and toll-free number are boldly displayed to allow Canadian ZAI Claimants to obtain complete information and a claim form.

### CONSUMER MAGAZINES

Magazines were analyzed for their composition<sup>2</sup> and coverage<sup>3</sup> of Adults 35+. The Canadian ZAI PD Published Bar Date Notice will be placed in the following publications:

- A full-page ad (7-7/8" x 10-1/2") will be placed once in *Chatelaine* (English) with an estimated circulation of 596,887. The readership among Adults 35+ is 2,864,000.
- A full-page ad (7-7/8" x 10-1/2") will be placed once in *Chatelaine* (French) with an estimated circulation of 200,106. The readership among Adults 35+ is 792,000.
- A full-page ad (7-7/8" x 10-1/2") will be placed once in *L'Actualite* with an estimated circulation of 185,395. The readership among Adults 35+ is 691,000.

<sup>2</sup> Composition is the percentage of target audience in readership.

<sup>3</sup> Coverage is the percentage of target audience reached.

In re W. R. Grace & Co., Chapter 11

The following table provides readership for the target audience:

PUBLICATION	APS	CIRCULATION	ADULTS
<i>Chatelaine</i> (English)	1	596,887	2,864,000
<i>Chatelaine</i> (French)	1	200,106	792,000
<i>L'Actualité</i>	1	185,395	691,000

**NEWSPAPERS**

To provide broad national coverage, newspaper advertising will include ads in two national newspapers as well as 22 of the largest-circulating newspapers in the 10 Provinces. These newspapers also include the four largest French language newspapers in Canada where approximately 20% of adults are French speaking. The ads placed in the following newspapers will be equivalent in size to a standard quarter-page U.S. ad (measuring approximately 6" x 11") and will appear on the highest circulating day:

PROVINCE	CITY	NEWSPAPER	CIRCULATION
National		<i>Globe &amp; Mail</i>	416,584
		<i>National Post</i>	243,126
Alberta	Calgary	<i>Herald</i>	117,513
	Calgary	<i>Sun</i>	98,000
	Edmonton	<i>Journal</i>	133,144
British Columbia	Vancouver	<i>Province</i>	143,300
	Vancouver	<i>Sun</i>	178,508
	Victoria	<i>Times Colonist</i>	76,987
Manitoba	Winnipeg	<i>Free Press</i>	120,502
New Brunswick	Thunder Bay	<i>Chronicle Journal</i>	29,098
Newfoundland	St. John's	<i>Telegram</i>	55,000
Nova Scotia	Halifax	<i>Chronicle Herald</i>	108,586
Ontario	Hamilton	<i>Spectator</i>	115,303
	London	<i>Free Press</i>	110,000
	Ottawa	<i>Citizen</i>	135,258
	Toronto	<i>Star</i>	643,489
	Toronto	<i>Sun</i>	188,102
Prince Edward Island	Charlottetown	<i>The Guardian</i>	24,874
Quebec	Montreal	<i>Gazette</i>	149,702
	Montreal	<i>La Presse (French)</i>	300,000
	Montreal	<i>Le Journal (French)</i>	319,736
	Quebec (city)	<i>Le Soleil (French)</i>	230,000
	Quebec (city)	<i>Le Journal (French)</i>	145,000
Saskatchewan	Saskatoon	<i>Star Phoenix</i>	60,000
		<b>TOTAL</b>	<b>4,141,822</b>

In re W. R. Grace & Co., Chapter 11

**TV ADVERTISING DESIGN AND PLACEMENT**

The television buy will consist of English and French language network broadcast and national cable television. Thirty-second spots will be aired over a one to two week time period.

Television is an intrusive medium that generates rapid awareness and provides effective reach of the audience. The television spot is designed to provide both audio and visual information to alert individuals that they may be Canadian ZAI Claimants in the bankruptcy and that they should seek further information through the toll-free number or website to determine their status as a claimant and procedures to file a claim. The tone of the spot is similar to the print executions, alerting the potential Canadian ZAI Claimants to the nature of the litigation and stressing the importance of the information to follow. A layout of the TV spot is attached hereto as Exhibit 2.

The planned daypart mix or times of day selected for airing the spots is as follows:

DAYPART	PER ADULTS 35+ (%)
Early Morning News 5:00 AM – 9:00 AM (M-F) 6:00 AM – 11:00 AM (Sa-Su)	50.0
Daytime 9:00 AM – 3:00 PM (M-F)	14.0
Fringe 3:00 PM – 5:00 PM (M-F)	25.0
Prime 7:00 PM – 10:00 PM (M-Sa) 6:00 PM – 10:00 PM (Su)	36.0
Cable 6:00 AM – 12:00 M (M-Su)	31.0

**INTERNET ADVERTISING DESIGN AND PLACEMENT**

According to PMB, over 25% of Homeowners and over 22% of Adults 35+ have access to the Internet whether at home, work, a library, school or other location. Over 50.0% of both target audiences accessed the Internet in the past 30 days. Internet advertising delivers an immediate message and allows the viewer of an advertisement to instantly link to a website for further information.

The banner advertisements will be designed to alert Internet users that they may be Canadian ZAI Claimants in the bankruptcy through the use of a bold headline. The short, simple headline will enable Canadian ZAI Claimants to quickly determine if they are potentially affected. When visitors click on the banner advertisement, they will be connected automatically to the informational website, [www.graceclaims.com](http://www.graceclaims.com).

In re W. R. Grace & Co., Chapter 11

KNC recommends using Internet advertising to provide additional notice opportunities beyond the broad-reaching print and television program to Canadian ZAI Claimants. Internet advertising will appear across a wide range of websites enabling maximum exposure opportunities to reach the broad audience of Adults 35+.

The Internet buy will consist of:



- 24/7 Real Media (Canada Network) is a network that represents over 900 websites including sites related to health, fitness and news and information, some of which are proprietary and confidential.
- Banner advertisements of various measurements will appear, on a rotating basis, on websites that are part of the 24/7 Real Media Network delivering an estimated 16,666,667 gross impressions.
- The banner advertisements will appear for a 30 day period, or until the gross impressions are delivered.

In re W.R. Grace & Co., Chapter 11

## MEDIA DELIVERY

Using national consumer magazines, national and local newspapers, broadcast television and Internet advertising, the media program delivers the following reach and frequency of exposure measurements:

- The estimated reach of Adults 35+ is 85.5% with an estimated average frequency of 3.5 times.

The plan delivers 54,575,000 gross impressions for Adults 35+. It is estimated that Adults 35+ will see the media vehicles carrying the notice over 54 million times.

In re W. R. Grace & Co., Chapter 11

## ABORIGINAL SITUATION ANALYSIS

When examining the Aboriginal population in Canada, data from the 2006 Canadian Census indicate that:

- Aboriginal people in Canada are members of at least one Aboriginal group: North American Indian (or First Nations), Métis, or Inuit.
- A total of 1,172,790 people identified themselves as an Aboriginal person.
- Aboriginal people account for 3.8% of the total population of Canada.
- The Aboriginal population is becoming increasingly urban.
- In 2006, 54% lived in an urban center.
- Over 90% of the Aboriginal population speaks English, with approximately 7% speaking only their Native language.
- Over 81% of the Aboriginal population resides in the following five Canadian Provinces:
  - Ontario (19.3%)
  - British Columbia (17.4%)
  - Alberta (16.0%)
  - Manitoba (15.4%)
  - Saskatchewan (13.3%)
- Additionally, Inuit peoples make up over 85% of the Nunavut Territory's total population.

In re W. R. Grace & Co., Chapter 11

## ABORIGINAL MEDIA

The Notice Program outlined above already includes national television, three national magazines, two national newspapers, and 13 daily newspapers in the five provinces where over 81% of the Aboriginal population is concentrated. In order to further reach the Aboriginal peoples in Canada, KNC will utilize national Aboriginal magazines, local (regional) newspapers, and national television on the Aboriginal Peoples Television Network ("APTN").

### MAGAZINES

KNC will run one full-page ad in each of the following national Aboriginal magazines in order to reach Aboriginal peoples nationally (all ads will be in English):

- *Aboriginal Times* with an estimated circulation of 100,000.
- *First Perspective* with an estimated circulation of 15,000.
- *Native Journal* with an estimated circulation of 15,000.
- *Windspeaker* with an estimated circulation of 25,000.

### NEWSPAPERS

Due to the large proportion of Inuit peoples living in the Nunavut Territory, KNC also suggests running ads in three local, regional newspapers in the Nunavut Territory. Because approximately 65% of the Inuit population speaks the native Inuktitut language in their homes, KNC recommends running one-sixth page ads once in each of the following publications in the Inuktitut language:

- *Kivalliq News* with an estimated circulation of 1,600.
- *Nunatsiaq News* with an estimated circulation of 6,000.
- *Nunavut News/North* with an estimated circulation of 6,200.

### TELEVISION

APTN is a national Aboriginal network that broadcasts throughout Canada. The network is available in nearly 100% of Aboriginal households on reserves and 85% of Aboriginal households in the far North. Independent Aboriginal producers create the programming, and over 50% of the programming is exclusive to the network. The network features a variety of content including youth programming, drama, movies, entertainment and news. 60% of programming is in English, 15% in French and 25% in a variety of Aboriginal languages.

KNC proposes running 30 and 60-second spots on APTN in English, French and Inuktitut.

In re W. R. Grace & Co., Chapter 11

## ABORIGINAL MEDIA DELIVERY

Reach and frequency estimates are not available for the media outlined above, as aboriginal readership and viewership are not measured. However, the Notice Program outlined above will already reach 85.5% of Canadian Adults 35+ with an estimated average frequency of 3.5 times. This addition of the outlined Aboriginal media will only serve to increase the existing reach and frequency estimates.

*In re W. R. Grace & Co., Chapter 11*

## **EARNED MEDIA**

The thrust of the earned media program is to amplify the notice to Canadian ZAI Claimants through the use of free media. The earned media portion of this Notice Plan will augment the paid media plan developed. The third-party endorsement from reliable sources such as the news media can add immeasurable value to outreach efforts.

Outreach to print and electronic media will focus primarily on major radio and television outlets, key daily newspapers, wire services and newspaper bureaus in Canada. A press release highlighting the toll-free telephone number and website address that Canadian ZAI Claimants can call or visit for complete information will be distributed as follows:

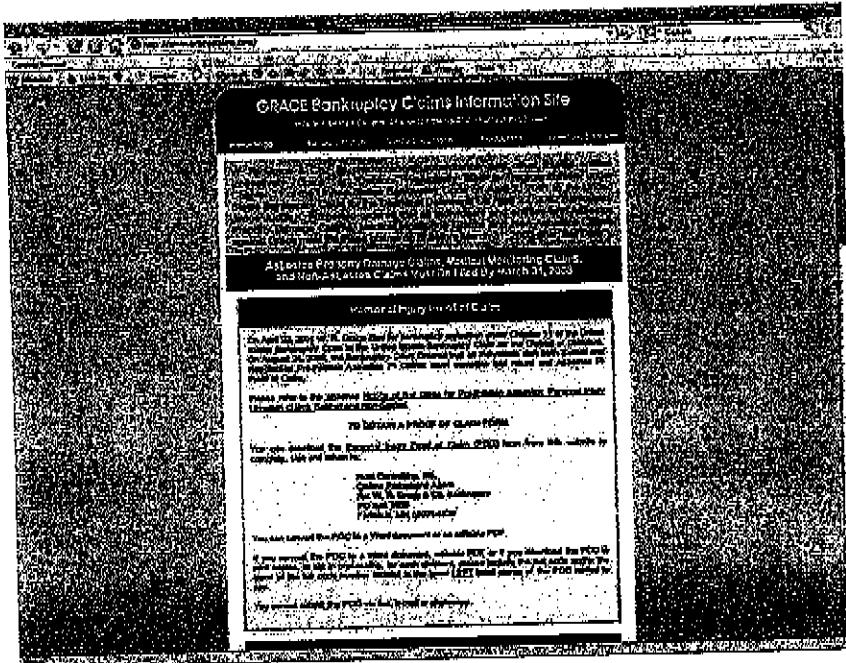
- On the Canadian Newswire reaching approximately 350 English and French media outlets.

In re W. R. Grace & Co., Chapter 11

## INFORMATIONAL WEBSITE

The Canadian ZAI PD Claims Bar Date Notice Package will be posted on the Grace Chapter 11 website, as a PDF file, enabling all Canadian ZAI Claimants to view the Canadian ZAI PD Claims Bar Date Notice Package. The site will be listed with search engines and indexes.

The website, established at [www.graceclaims.com](http://www.graceclaims.com), is designed for ease of use and comprehension. Web pages on the site are simple, containing words, icons, documents and images. A directory, located at the top of the page, provides links to the information available on the website. These links to the homepage and subsections remain fixed on top as users navigate around the website.



In re W. R. Grace & Co., Chapter 11

## TOLL-FREE TELEPHONE SUPPORT

All print and television advertising will give the reader/viewer the option of calling a toll-free telephone number in order to receive the Canadian ZAI PD Claims Bar Date Notice Package and obtain information and instructions regarding filing proofs of claim. The toll-free telephone number will be accessible to Canadian ZAI Claimants, and it will include an option for French speakers. In addition to the toll-free number, the print and television advertising will provide the website address, and the print advertising will also include the address of the Claims Agent as alternative contact mechanisms.

## ESTIMATED BUDGET

### I. PAID MEDIA

A. Canadian Media <sup>1</sup>	\$720,500.00
B. Aboriginal Media - TV, Magazines and Newspapers	\$34,500.00
<b>TOTAL ESTIMATED PAID MEDIA EXPENSES</b>	<b><u>\$755,000.00<sup>2</sup></u></b>

### II. PRODUCTION AND DISTRIBUTION

A. Print and Internet Ad Production and Distribution	\$2,000.00
B. Television Spot(s) Production and Distribution	\$25,000.00
C. Press Release Production, Distribution and Tracking	\$2,000.00
D. Website updates and hosting (6 months @ \$250/month)	\$2,500.00
<b>TOTAL ESTIMATED PRODUCTION EXPENSES</b>	<b><u>\$31,500.00</u></b>

### III. MISCELLANEOUS EXPENSES

A. Courier, Duplicating, Overnight, Delivery, Postage, Telefax, Telephone, Travel, Etc.	\$5,000.00
B. Translations	\$1,000.00
<b>TOTAL ESTIMATED MISCELLANEOUS EXPENSES</b>	<b><u>\$6,000.00</u></b>

### IV. ESTIMATED TOTAL BUDGET

**\$792,500.00<sup>3</sup>**

1. Television cost estimates are subject to change based upon availabilities at the time of actual placement.

2. Upon receiving final approval, KNC will negotiate final advertising rates. Advertising rates are set by the individual publications and are subject to change without notice. While the rates we have quoted are current, they are subject to change prior to the time an ad actually appears. We will make every effort to update any changes in the advertising rates we have quoted and to negotiate the best rates possible.

3. Canadian budget is expressed in US dollars using an estimated exchange rate of 1.024 of Canadian dollars. Actual US dollars could change based on exchange rate at time of placement.

Legal Notice

## If You Have a Home Located in Canada with Vermiculite/Zonolite Loose-Fill Attic Insulation

### Your Rights May Be Affected by the W. R. Grace Bankruptcy

A settlement has been reached, and a fund has been established to pay valid Canadian ZAI Claims against Grace. To preserve your claim against Grace, you must file the Bankruptcy Court approved claim form.

#### Your Claim Must Be Filed By Month Date Year

If your home is located in Canada and has vermiculite/zonolite loose-fill attic insulation, you may have a property claim against W.R. Grace and its related entities ("Grace"). Grace has filed for protection under Chapter 11 of the U.S. Bankruptcy Code.

**What Is Vermiculite Loose-Fill Attic Insulation?**  
Vermiculite was used by Grace in certain non-roll home attic insulation that was sold from the 1920/1930s to 1984. Some of Grace's vermiculite attic insulation contains naturally-occurring asbestos and was sold under the name of "Zonolite Attic Insulation" ("ZAI") and under other brand names, including: Attic Fill, House Fill, Home Insulation, Zonolite Insulating Fill, Econofil, Quiselle Insulating Fill, Sears Micro Fill, Ward's Mineral Fill, Wickes Attic Insulation, Attic Plus, Mica Pellets Attic Insulation, Unifil and

Cashway Attic Insulation.

**What Does It Look Like And Where Is It Located?**  
ZAI is an insulation product typically used in home attics and sometimes in walls. The granules are small, accordion-shaped nuggets and may have a silvery, gold translucent or brownish cast that may also appear black or gray over time. ZAI may be found underneath other insulation installed at a later date.

#### What Are ZAI Property Claims?

ZAI claims could include, among others, the cost of abatement or removal, the diminution of property value, economic loss, or other property-related claims caused by ZAI manufactured by Grace. Personal Injury Claims involving ZAI will be handled separately by a U.S. Asbestos Personal Injury Trust.



Loose vermiculite



Vermiculite nugget size

You may obtain the appropriate claim form and more information on how to file a claim by writing:

Claims Processing Agent, W. R. Grace & Co. Bankruptcy,  
P. O. Box 1620, Faribault, MN 55021-1620 or

Call: 1-877-465-4817 or visit: [www.graceclaims.com](http://www.graceclaims.com)

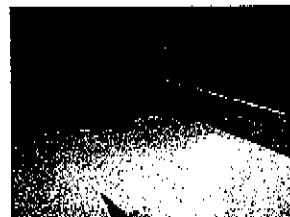
**30-SECOND W. R. GRACE BAR DATE SPOT\***

**Court Ordered Legal Announcement**



**1-877-465-4817**  
[www.graceclaims.com](http://www.graceclaims.com)

**Zonolite Attic Insulation Property Claims**



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**Zonolite Attic Insulation Property Claims**

**You must file a claim by  
Month Date Year**

**1-877-465-48147**  
[www.graceclaims.com](http://www.graceclaims.com)

If your home has loose-fill, non-roll vermiculite attic insulation, you may have a claim against W. R. Grace. A settlement fund will pay valid Canadian Property Claims involving Zonolite Attic Insulation. Claims must be filed by Month Date Year.

Zonolite was also sold under different names. It consists of expanded nuggets that appear silver, brown, gold, black or grey. It may be under other insulation.

Please call 877-465-4817 or go to  
[graceclaims.com](http://graceclaims.com).

**\*Visual treatment is in draft form and will  
not be finalized until a later date.**